IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: :

Kyra Y. Riddick : Chapter 13

Case No. 22-12153-ELF

Debtor(s) :

RESPONSE TO THE MOTION FOR RELIEF OF AUTOMATIC STAY FILED BY MIDFIRST BANK

Debtor, Kyra Y. Riddick by and through their undersigned Counsel, Brad J. Sadek, in response to the Motion for Relief filed by MidFirst Bank hereby submits the following:

- 1. Admitted
- 2. Admitted.
- 3. Admitted.
- 4. Admitted.
- 5. Admitted.
- 6. Admitted in part; Denied in part. Debtor avers some payments were missed and others were paid. Debtor will provide proof of accounting to compare with Movant's.
- 7. Denied. Debtor unsure of the same.
- 8. Denied.

Date: 1/4/2023

9. No response required.

WHEREFORE, Debtor, by and through the undersigned counsel, respectfully requests that Movant shall be denied an Order granting relief of the Automatic Stay pursuant to 11 U.S.C.§ 362.

/s/ Brad J. Sadek, Esq

Brad J. Sadek, Esq. Attorney for the Debtor

1500 JFK Boulevard Suite #220

Philadelphia, PA 19102

(215) 545-0008

CERTIFICATE OF SERVICE

I, Brad J. Sadek, Esq. certify that on the date indicated below served a true and correct copy of the Debtor's Response to the Motion for Relief from Automatic Stay by electronic or Regular U.S. Mail on all creditors and the following parties:

Kenneth E. West, Esq.

Standing Chapter 13 Trustee Electronic Notice

Denise Carlon, Esq.

Attorney for Movant MidFirst Bank
Electronic Notice to bkgroup@kmllawgroup.com

Dated: January 4, 2023

/s/Brad J. Sadek, Esq
Brad J. Sadek, Esq.
Attorney for Debtor(s)